

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONALD FOXWORTH

Plaintiff,

v.

GREYSTONE ALLIANCE, LLC,

Defendant.

**CIVIL ACTION
FILE NO. 1:11-cv-4299-CC-AJB**

**DEFENDANT GREYSTONE ALLIANCE, LLC'S
MOTION FOR JUDGMENT ON THE PLEADINGS AS TO PLAINTIFF'S
CLAIMS ASSERTED PURSUANT TO THE TELEPHONE CONSUMER
PROTECTION ACT**

COMES NOW, Greystone Alliance, LLC, Defendant in the above-referenced action (hereinafter "Defendant"), and pursuant to Rule 12(c) of the Federal Rules of Civil Procedure move this Court for judgment on the pleadings as to Plaintiff's claims asserted under the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227. In support of this motion, Defendant submits herewith its brief containing its argument and citation of authorities.

WHEREFORE, Defendant respectfully requests that this motion be granted and Plaintiff's TCPA claims be dismissed with prejudice.

This 20th day of June, 2012.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ John H. Bedard, Jr.

John H. Bedard, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served all parties of record with a copy of Defendant Greystone Alliance, LLC's Motion and Brief in Support of *Defendant's Motion for Judgment on the Pleadings as to Plaintiff's Claims Asserted Pursuant to the Telephone Consumer Protection Act* by depositing a copy of same in the United States Mail, with first-class postage affixed thereto, properly addressed as follows:

Donald Foxworth
3841 Kensington Road
Decatur, Georgia 30032

This 20th day of June, 2012.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ John H. Bedard Jr.
John H. Bedard Jr.
Georgia Bar No. 043473